

July 7, 1995

MEMORANDUM

TO: Brian Monson, Chief
Operating Permits Bureau

FROM: Almer B. Casile, Air Quality Engineer
Operating Permits Bureau

THROUGH: Sue Richards, Engineering Manager
Operating Permits Bureau

SUBJECT: Technical Analysis for Tier II Operating Permit #005-00004
Ash Grove Cement Company, Inkom, Idaho

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01 Sections 400 through 406 (Rules for the Control of Air Pollution in Idaho) for issuing Operating Permits.

FACILITY DESCRIPTION

The Ash Grove Cement (AGC) plant has an annual production of approximately a 220,000 tons of cement. The plant is situated along the bank of the Portneuf River, approximately 11 miles south-east of Pocatello, Idaho. The plant produces clinker from raw materials, and processes it, the clinker, into cement.

The cement making process begins with the mining of MgO Limestone, clay, shale, and limestone from the quarry located adjacent to the facility. The raw materials are blasted from bedrock, bulldozed to the quarry floor, and hauled to the jaw crusher. Silica and iron ore used in the process are hauled to the plant and stockpiled in the quarry.

The raw materials are crushed and screened until an appropriate size is obtained. The processed materials are then transported by conveyor belt from crushing and screening to storage silos. From the storage silos, a measured amount of processed materials is transported to a ball mill by conveyor belt. The ball mill grounds the processed materials into homogeneous mixture of water and rock in the form of a slurry.

The slurry is fed at the back of the kilns and calcined. To reach the temperatures needed to calcine the slurry, gases within the kiln flow countercurrent to the material flow and are heated to an excess of 1,650 °C (3,000 °F) by fossil and waste fuels. The material within the kiln reaches a temperature of approximately 1,538 °C (2,800 °F) before exiting the kiln and entering the clinker cooler.

Clinker enters the clinker coolers beneath the kilns. Secondary air entering the kilns is used as the air for the clinker cooler. All forced air entering the coolers is utilized in the kiln as primary and secondary air for combustion. The clinker leaves the cooler at an approximate temperature of 260 °C (500 °F). Drag chains, elevators, conveyor belts, and an overhead crane are used to transport the warm clinker from the clinker cooler to the clinker storage area, clinker storage silo, and craneway storage area. Clinker is transported from storage to three finish ball mills which grind the clinker with gypsum into cement. Separators are used to return oversized particles back to the mills for additional grinding.

FK pumps transfer the cement to 13 cement storage silos. Screws, airslides, and elevators then transfer the cement from the cement storage silos to truck loadout, bulk rail loadout, or the bagging area for packaging.

For a listing of all transfer points, point sources, roads, storage piles, and their associated emissions, please refer to Appendix A.

PROJECT DESCRIPTION

This project involves the issuance of an Operating Permit that implements RACT/RACM for PM/PM₁₀ emissions generated at AGC. The issuance of this permit is needed to satisfy conditions needed to extend the attainment date for the Power-Bannock Counties Nonattainment Area (PBNAA) and have the Inkom segment of the PBNAA redesignated attainment.

SUMMARY OF EVENTS

In order to satisfy conditions needed to extend the attainment date for the PBNAA and have the Inkom segment of the PBNAA redesignated attainment, AGC submitted a request for a PM₁₀, SIP Tier II operating permit on January 19, 1995. On March 2, 1995, Lore Bensel, Office of the Attorney General, sent AGC letter further clarifying the conditions set by EPA for the extension of the attainment date for PBNAA, and explaining the Tier II permitting process. On April 4, 1995, the Tier II operating permit application was submitted to DEQ. On April 14, 1995, DEQ received a amendment to the application. The application was determined administratively complete on May 12, 1995. The 30-day public comment period began on May 25, 1995, and extended until June 27, 1995. On June 23, 1995, DEQ received AGC's comments to the proposed permit.

DISCUSSION

1. Emission Calculations

All comments submitted by AGC were incorporated into the permit with the following exceptions:

1. Inconsistencies were noted between the proposed raw material inputs (i.e. limestone and silica inputs) on Table 1 of Proposed Emission Limits Section of AGC's comments, and Table 3 of the same section. Table 3 raw materials inputs were changed to reflect the values shown on Table 1. It should be noted that when these changes were made Table 3 automatically calculated average ton per hour values. These average ton per hour values were used as the ton per hour throughput limits, as determined on an average monthly basis.
2. An inconsistency was noted between the requested changes in the Silo Withdrawal, Conveying, and Storage section of the proposed PM10 SIP (Tier II) operating permit and Table 3 of the Proposed Emission Limits Section of AGC's comments. The annual throughput requested by AGC was incorporated into the permit. It should be noted that when the requested annual throughput was used as an input into for Table 3, a ton per hour value was automatically calculated by the spreadsheet. The automatically calculated ton per hour value was used as the ton per hour throughput limit, average monthly based, in the permit.
3. An inconsistency was noted between the requested changes in the Clinker Reclaim section of the proposed PM10 SIP (Tier II) operating permit and Table 3 of the Proposed Emission Limits Section of AGC's comments. AGC requested that Clinker Reclaim Section 4.1 of the proposed PM10 SIP (Tier II) operating permit be rewritten as follows:

"The process rate for the grinding of clinker shall not exceed 370,000 ton(s) per year. The three finish grindind mills shall not process in excess of 26 tons of clinker per hour for each mill on a monthly average basis."

This requested change was inconsistent with the information given on pp. 2 - 3 of Table 3 Proposed Process Fugitive Emissions for Ash Grove Cement. For the purpose of expediency, the total throughput, in tons per year and average tons per hour, to bins #1-#3 given in Table 3 were used as the operation limitations for clinker reclaim and as the basis for determination fugitive emissions from this process area. It should also be noted that the requested 26 tons per hour throughput limit, when multiplied by 8760 hours per year of operation, did not equate to 370,000 tons per year.

4. The requested changes in the Section 4.1 of Finish Grinding and Associated Handling in the proposed PM10 SIP (Tier II) operating permit was changed to read as follows:

"Each of the three (3) finish mills shall process no more than twenty-six (26) tons of material per hour on a daily average basis, twenty (20) tons per hour on a monthly average basis, and 175, 200 tons of cement total per year."

The above changes were made because inconsistencies were noted in the requested changes. AGC requested 26 tons per hour on a monthly average basis and 370,000 tons of total cement per year. The annual value of 370,000 tons of total cement per year could not be determined by multiplying 26 tons per hour by 8760 hours of operation. Also, data provided by AGC showed average monthly ton per hour values to be 20 tons per hour, and average daily values to be 26 tons per hour. Inconsistencies were also noted in the process rates of mills #2 and #3. (This was noted when a comparison of proposed inputs and propose emissions were made). The appropriate values for these two mills were changed to reflect the 20 ton per hour and 175,200 ton per year values proposed above.

Other material considered in the revision of the proposed permit is included in attachment B. All other methods for the determination of emissions, emission limits, and operating limits are included in Attachment A and in the May 15, 1995, technical analysis memo for the proposed permit.

2. Modeling

All modeling has been documented in the SIP.

3. Area Classification

AGC is located in Inkom, which is located in the Power-Bannock Counties Nonattainment Area. This area is nonattainment for PM₁₀ and attainment or unclassified for other criteria pollutants.

4. Facility Classification

The facility is a portland cement plant (SIC #3241) and is a designated facility, as defined in IDAPA 16.01.01.006.25. The facility is a major facility, as defined in IDAPA 16.01.01.00654, because actual emissions of PM, NO_x, SO₂, and CO exceed 100 tons per year. The facility is also subject to NSPS, 40 CFR 60 Subpart F.

5. Regulatory Review

This operating permit is subject to the following permitting regulations:

A. State

IDAPA 16.01.01.006
IDAPA 16.01.01.401
IDAPA 16.01.01.402
IDAPA 16.01.01.403
IDAPA 16.01.01.404
IDAPA 16.01.01.405
IDAPA 16.01.01.406
IDAPA 16.01.01.470
IDAPA 16.01.01.525
IDAPA 16.01.01.625
IDAPA 16.01.01.650

Definitions;
Tier II Operating Permit;
Application Procedures;
Permit Requirements;
Procedure for Issuing Permits;
Conditions for Tier II Operating Permit;
Obligation to Comply;
Permit Application Fees for Tier II Permits;
Registration and Registration Fees;
Visible Emissions Limitations;
General Rules for the Control of Fugitive Dust;

B. Federal

40 CFR 60 Subpart F

Standards of Performance for Portland Cement Plants

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Recommendation

Based on the review of the PBNAA SIP evaluation, and of state and federal correspondence regarding the attainment date of PBNAA, I recommend that Ash Grove Cement, located in Inkom, Idaho, be issued a Tier II Operating Permit.

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cc: A. Cole, SEIRO
R. Elkins, SEIRO
Source File
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APPENDIX A

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PROPOSED

PHOTOGRAPH BY JEFFREY L. BROWN

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Table 1

**PROPOSED
BUREAU FOR THE TRANSFER OF ABOVE PROPERTY**

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TABLE 1 PROPOSED EMISSIONS SUMMARY FOR ASH GROVE CEMENT

SOURCE CATEGORY	POLLUTANT	PROPOSED EMISSIONS (T/YR)
POINT SOURCES	TSP	157.6
PROCESS FUGITIVES	TSP	204.2
PAVED ROADS	TSP	16.1
UNPAVED ROADS	TSP	16.6
INTERNAL TRANSFERS	TSP	3.6
PILEs	TSP	4.2
TOTAL	TSP	402.3
POINT SOURCES	PM ₁₀	133.9
PROCESS FUGITIVES	PM ₁₀	86.6
PAVED ROADS	PM ₁₀	3.5
UNPAVED ROADS	PM ₁₀	6.0
PILEs	PM ₁₀	2.0
TOTAL	PM ₁₀	232.0

**PROPOSED
MATERIAL INPUTS FOR ASH GROVE CEMENT**

PROCESS	SOURCE	MATERIAL	PROPOSED TONS/YR (Received/Shipped)	PROPOSED TONS/YR (Used/Produced)
RAW MATERIALS		SILICA	40000	40000
		IRON ORE	4000	4000
		GYPSUM	21000	21000
		LIMESTONE (HIGH)	190000	190000
		LIMESTONE (LOW)	190000	190000
		MGO ROCK (DOLOMITE)	0	0
TOTAL LIMESTONE			380000	380000
AIDS		GRINDING AID	116	116
RAW FEED TO KILN	TOTAL MILLS	RAW MEAL (GROUND)		450000
		RAW MEAL (KILN FEED)		450000
FUELS - KILN	KILN #1	COAL	70000	35000
	KILN #2	COAL	0	35000
	KILN #1	OIL (tons)	6505	3849
	KILN #2	OIL	0	2835
	KILN #1	TIRES	2781	0
	KILN #2	TIRES	0	2792
CLINKER PRODUCTION	KILN #1	CLINKER PRODUCED	110000	110000
	KILN #2	CLINKER PRODUCED	140000	140000
	TOTAL CLINKER PRODUCED		250000	250000
	CLINKER SHIPPED		0	
	CLINKER RECEIVED		80000	80000
	FINISH MILL #1	CLINKER		116235
		ROCK		0
		GYPSUM		6765
		TOTAL (CEMENT)		123000
	FINISH MILL #2	CLINKER		116235
		ROCK		0
		GYPSUM		6765
		TOTAL (CEMENT)		123000
		CLINKER		116235
		ROCK		0
PRODUCTION (CEMENT)		GYPSUM		6765
		TOTAL (CEMENT)		123000
	FINISH MILL #3	CLINKER		116235
		ROCK		0
		GYPSUM		6765
		TOTAL (CEMENT)		123000
PRODUCTION (MASONARY)	FINISH MILL #1	CLINKER		254
		ROCK		174
		GYPSUM		7
		TOTAL		435
	FINISH MILL #2	CLINKER		258
		ROCK		176
		GYPSUM		7
		TOTAL		441
	FINISH MILL #3	CLINKER		0
		ROCK		0
		GYPSUM		0
		TOTAL		0
		TOTAL CLINKER USED	349216	
		TOTAL ROCK USED	350	
SHIPMENTS	SUMMARY	TOTAL GYPSUM USED	20310	
		TOTAL CEMENT PRODUCED	369000	
		TOTAL MASONARY PRODUCED	878	
	BAGGED	CEMENT	0	
		MASONARY	0	
		TOTAL	370000	
TRUCK (BULK)	RAIL	CEMENT		
		MASONARY		
		TOTAL	0	
		CEMENT		
		MASONARY		
		TOTAL	0	
OTHER		POTASH	10000	
		CKD	5000	
		GASOLINE (8534 GAL)	32	
		DIESEL (43356 GAL)	183	
		ROAD ROCK (GROUND)	3202	
		RAIN DAYS	90	
OPERATING HOURS	FACILITY		HRS/YR	AVERAGE T/H/R
		JAW CRUSHER	2838	122
		HAMMER CRUSHER	2838	122
		cone CRUSHER (SILICA)	4161	43
		RAW MILL (NO. 4 MILL)	8500	48
		RAW MILL (NO. 3 MILL) BACKUP	0	
		COAL HANDLING	250	
		KILN NO. 1	8448	12
		KILN NO. 2	8049	15
		CLINKER HANDLING	8760	
		FINISH MILL NO. 1	6600	19
		FINISH MILL NO. 2	6600	19
		FINISH MILL NO. 3	6600	10
		PACKING & cement transfer	7000	
		BULK LOADING	7000	

TABLE 2

PROPOSED PARTICULATE EMISSIONS FROM POINT SOURCES AT ASH GROVE CEMENT

Stack No.	ID No.	Area served	Source Description	Flow Rate (acfm)	Temp. (F)	Grain Loading (gr/dscf)	Flow Rate (dscfm)	Operating Hours (hrs/yr)	Actual TSP Emissions (lb/hr)	Actual TSP Emissions (Ton/yr)	PM ₁₀ Fraction %	Actual PM10 Emissions (Ton/yr)	Maximum Hours (hrs/yr)	Potential TSP Emissions (Ton/yr)
1	C1	KILN # 1	ESP # 1	39294	469	0.021	22333	8448	4.02	50.84	85%	43.21	8760	50.84
2	C2	KILN # 2	ESP # 2	39936	351	0.0256	26000	8049	5.71	73.91	85%	62.82	8760	73.91
3	C3	DRAGS/COOLER	BAGHOUSE # 1	2800	140	0.03	2464	8600	0.63	2.72	85%	2.32	8760	2.78
4	C4	CLINKER ELEVATOR	BAGHOUSE # 2	3992	129	0.03	3579	8600	0.92	3.96	85%	3.36	8760	4.03
5	C5	CLINKER/SILO	BAGHOUSE # 3	3000	100	0.03	2829	7000	0.73	2.55	85%	2.16	8760	3.19
6	C6	CLINKER RECLAIM	BAGHOUSE # 4	600	70	0.03	598	7000	0.15	0.54	85%	0.46	8760	0.67
7	C7	FINISH MILLS #1 & # 2	BAGHOUSE # 5	7600	190	0.03	6174	6600	1.59	5.24	85%	4.45	8760	6.95
8	C8	FINISH MILL #3	BAGHOUSE # 6	10000	190	0.03	8123	6600	2.09	6.89	85%	5.86	8760	9.15
9	C10	BULK LOADING	BAGHOUSE # 7	1200	70	0.03	1195	7000	0.31	1.08	85%	0.91	8760	1.35
10	C9	SILOS/PACKAGING	BAGHOUSE # 8	11000	70	0.03	10958	7000	2.82	9.86	85%	8.38	8760	12.34
TOTAL										157.58		133.94		165.20

PM10 (BAGHOUSE) FRACTION FROM AP42, TABLE C2_CATORGORY 4

TABLE 3

**PROPOSED
PROCESS FUGITIVE EMISSIONS FOR ASH GROVE CEMENT**

PROCESS	FUG	NAME FROM	NAME TO	HRS	DAYS	MAXIMUM	AVERAGE	ANNUAL	EMISSION	FACTORS	REF	PM10	MOIST	CAPT.	BUILD	EMISSIONS		TSP	PM-10			
																PM10	EMISS	TSP	EMISS			
																LB/HR	LB/HR	TYR	TYR			
F 1	DRILLING			24	0	320	LIMESTONE		380000	0.0001	0.0000		5%	0%	0%	0%			0.02	0.00		
F 2	BLASTING			24	0	0	LIMESTONE		380000	0.0000	0.0000	Tb 8.19 2.2	5%	0%	0%	0%			30.40	1.52		
F 3	DOZING	D9L				191	LIMESTONE		2 6400	1.6500	Tb 8.24.2	63%							0.25	0.16		
		D10N				195	LIMESTONE		2 6400	1.6500		63%						2.58	1.61			
MATERIAL RECEIVING AND CRUSHING	F 4	LOADER	FEEDER	8	334	2672	LIMESTONE	180	150	400000	0.0350	0.016	AP42	5%	0%	0%	0%	0.05	1.05	1.40	0.07	
					3	44	132	GYPSUM	180	159	21000	0.0350	0.016	Tb 8.19 2.1	5%	0%	0%	0%	0.06	1.11	0.07	0.00
					2	17	34	IRON ORE	180	118	4000	0.0350	0.016		5%	0%	0%	0%	0.04	0.82	0.01	0.00
					4	104	416	SILICA	180	108	45000	0.0350	0.016		5%	0%	0%	0%	0.04	0.76	0.16	0.01
	F 5	FEEDER	JAW CRUSHER	8	334	2672	LIMESTONE	180	150	400000	0.0350	0.0162		46%	50%	0%	0%	0.12	0.26	0.35	0.16	
					3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	50%	0%	0%	0.10	0.21	0.00	0.00
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0162		46%	50%	0%	0%	0.09	0.19	0.00	0.00
					4	104	416	SILICA	180	108	45000	0.0350	0.0162		46%	50%	0%	0%	0.09	0.19	0.04	0.02
	F 6	JAW CRUSHER	#1 INCLINE BELT	8	334	2672	LIMESTONE	180	150	400000	0.0350	0.0162		46%	50%	0%	0%	0.12	0.26	0.35	0.18	
					3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	50%	0%	0%	0.13	0.26	0.02	0.01
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0162		46%	50%	0%	0%	0.10	0.21	0.00	0.00
					4	104	416	SILICA	180	108	45000	0.0350	0.0162		46%	50%	0%	0%	0.09	0.19	0.02	0.01
	F 7	#1 INCLINE BELT	#2 INCLINE BELT	8	334	2672	LIMESTONE	180	157	500000	0.0350	0.0162		46%	50%	0%	0%	0.60	1.31	1.76	0.81	
					3	44	132	GYPSUM	180	239	31800	0.0350	0.0162		46%	50%	0%	0%	0.77	1.61	0.11	0.05
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0162		46%	50%	0%	0%	0.38	0.82	0.01	0.01
					4	104	416	SILICA	180	108	45000	0.0350	0.0162		46%	50%	0%	0%	0.35	0.76	0.16	0.07
	F 8	#2 INCLINE BELT	#3 INCLINE BELT	4	104	416	SILICA	180	162	67500	0.0350	0.0162		46%	20%	0%	0%	0.21	0.45	0.09	0.01	
					2	17	34	IRON ORE	180	0	0	0.0350	0.0162		46%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 9	#3 INCLINE BELT	SCREEN #2	4	104	416	SILICA	180	162	67500	0.0350	0.0162		46%	20%	0%	0%	0.21	0.45	0.09	0.04	
					2	17	34	IRON ORE	180	0	0	0.0350	0.0162		46%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 10	SCREEN #2	CROSS COUNTRY B	4	104	416	SILICA	180	108	45000	0.0350	0.0263		75%	20%	0%	0%	0.23	0.50	0.08	0.05	
					2	17	34	IRON ORE	180	0	0	0.0350	0.0263		75%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 11	SCREEN #2	CONE CRUSHER	4	104	416	SILICA	180	92	22500	0.0350	0.0263		75%	20%	0%	0%	0.11	0.15	0.03	0.02	
					2	0	0	IRON ORE	180	0	0	0.0350	0.0263		75%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 12	CONE CRUSHER	#4 INCLINE BELT	4	104	416	SILICA	180	54	22500	0.0350	0.0162		46%	20%	0%	0%	0.70	1.51	0.32	0.15	
					2	0	0	IRON ORE	180	0	0	0.0350	0.0162		46%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 13	#4 INCLINE BELT	#2 INCLINE BELT	4	104	416	SILICA	180	54	22500	0.0350	0.0162		46%	20%	0%	0%	0.70	1.51	0.32	0.15	
					2	0	0	IRON ORE	180	0	0	0.0350	0.0162		46%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 14	#2 INCLINE BELT	SCREEN #1	8	355	2838	LIMESTONE	180	178	500000	0.0350	0.0162		46%	20%	0%	0%	0.29	0.49	0.70	0.32	
					3	44	132	GYPSUM	180	239	31500	0.0350	0.0162		46%	20%	0%	0%	0.67	1.04	0.02	0.02
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0162		46%	20%	0%	0%	0.15	0.33	0.01	0.00
	F 15	SCREEN #1	CROSS COUNTRY B	8	355	2838	LIMESTONE	180	141	400000	0.0350	0.0263		75%	20%	0%	0%	0.30	0.39	0.68	0.42	
					3	44	132	GYPSUM	180	159	21000	0.0350	0.0263		75%	20%	0%	0%	0.33	0.45	0.03	0.02
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0263		75%	20%	0%	0%	0.25	0.33	0.01	0.00
	F 16	SCREEN #1	HAMMER MILL	8	355	2838	LIMESTONE	180	35	100000	0.0350	0.0263		75%	20%	0%	0%	0.07	0.10	0.14	0.11	
					3	44	132	GYPSUM	180	80	10500	0.0350	0.0263		75%	20%	0%	0%	0.17	0.22	0.01	0.01
					2	17	34	IRON ORE	180	0	0	0.0350	0.0263		75%	20%	0%	0%	0.00	0.00	0.00	0.00
	F 17	HAMMER MILL	#1 INCLINE BELT	8	355	2838	LIMESTONE	180	35	100000	0.0350	0.0162		46%	50%	0%	0%	0.03	0.06	0.09	0.04	
					3	44	132	GYPSUM	180	80	10500	0.0350	0.0162		46%	50%	0%	0%	0.06	0.14	0.01	0.00
					2	17	34	IRON ORE	180	0	0	0.0350	0.0162		46%	50%	0%	0%	0.00	0.00	0.00	0.00
CONVEYING AND SILO STORAGE	F 18	CROSS COUNTRY B	BELT B	8	355	2838	LIMESTONE	180	134	380000	0.0350	0.0162		46%	20%	0%	0%	1.73	3.75	5.32	2.48	
					2	1419	2838	IRON ORE	180	1	4000	0.0350	0.0162		46%	20%	0%	0%	0.02	0.04	0.06	0.03
					4	110	2838	SILICA	180	14	40000	0.0350	0.0162		46%	20%	0%	0%	0.18	0.39	0.68	0.28
	F 19	BELT B	BELT C	8	355	2838	LIMESTONE	180	131	380000	0.0350	0.0162		46%	20%	0%	0%	1.73	3.75	5.32	2.48	
					4	710	2838	SILICA	180	1	4000	0.0350	0.0162		46%	20%	0%	0%	0.02	0.04	0.06	0.03
					2	1419	2838	IRON ORE	180	14	40000	0.0350	0.0162		46%	20%	0%	0%	0.18	0.39	0.56	0.25
	F 20	BELT C	SILOS (3)	8	355	2838	LIMESTONE	180	141	400000	0.0350	0.0162		46%	20%	0%	0%	0.18	0.39	0.56	0.26	
					4	104	416	SILICA	180	108	45000	0.0350	0.0162		46%	20%	0%	0%	0.14	0.30	0.08	0.03
					2	17	34	IRON ORE	180	118	4000	0.0350	0.0162		46%	20%	0%	0%	0.15	0.33	0.01	0.00
	F 21	CROSS COUNTRY B	GYPSUM BELT	3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	20%	0%	0%	2.06	4.45	0.79	0.14	
					3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	20%	0%	0%	2.06	4.45	0.29	0.14
	F 22	GYPSUM BELT	CHUTE	3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	20%	0%	0%	2.06	4.45	0.29	0.14	
	F 23	CHUTE	GYPSUM BIN	3	44	132	GYPSUM	180	159	21000	0.0350	0.0162		46%	20%	0%	0%	2.08	4.46	0.29	0.14	
STOCKPILE CRUSHED ROCK	F 24	CROSS COUNTRY B	CHUTE	8	25	200	LIMESTONE	180	118	23202	0.0350	0.0162		46%	20%	0%	0%	1.50	3.26	0.32	0.15	
					8																	

PROCESS FUGITIVE EMISSIONS FOR ASH GROVE CEMENT

PROCESS	FUG	NAME FROM	NAME TO	HRS	DAYS	YR	HRS/YR	MATERIAL	MAXIMUM THR-PUT	AVERAGE THR-PUT	ANNUAL THROUGHPUT	EMISSION TSP	FACTORS PM10	REF	PM10 FRAC %	MOIST CONT %	CAPT CONT %	BUILD CONT %	EMISSIONS TSP	TSP LB/HR	EMISS TYR	PM10 EMSS TYP	
				8	13	100		SILICA	100	50	5000	0.0350	0.0162		46%	20%	0%	0%	0.85	1.40	0.07	0.03	
SILO WITHDRAWAL	F 26	SILO FEEDER	FEED BELT	24	354	8500	1	LIMESTONE	75	22	190000	0.0350	0.0162		46%	0%	0%	0%	0.04	0.08	0.33	0.15	
CONVEYING AND RAW GRINDING	F 27	SILO FEEDER	FEED BELT	24	354	8500	1	LIMESTONE	75	22	190000	0.0350	0.0162		46%	0%	0%	0%	0.04	0.08	0.33	0.15	
	F 28	SILO FEEDER	FEED BELT	24	354	6500	1	SILICA	75	5	45000	0.0350	0.0162		46%	0%	0%	0%	0.01	0.02	0.08	0.04	
	F 29	SILO FEEDER	FEED BELT	24	354	8500	1	IRON ORE	75	0	4000	0.0350	0.0162		46%	0%	0%	0%	0.00	0.03	0.01	0.00	
	F 30	FEED BELT	MILL # 4	24	354	8500	1	LIMESTONE	75	45	380000	0.0350	0.0162		46%	0%	0%	0%	0.07	0.16	0.67	0.31	
				24	354	8500	1	SILICA	75	5	45000	0.0350	0.0162		46%	0%	0%	0%	0.01	0.02	0.08	0.04	
				24	354	8500	1	IRON ORE	75	0	4000	0.0350	0.0162		46%	0%	0%	0%	0.00	0.00	0.01	0.00	
	F 31	MILL #4	SLURRY TANK	24	354	8500	1	RAW MEAL	75	50	420000	0.0000	0.0000		50%	0%	0%	0%	0.00	0.00	0.00	0.00	
	F 32	FEED BELT	MILL #3 (BACK-UP)	24	0	0	0	LIMESTONE	75	#DIV/0!	0	0.0350	0.0162		46%	0%	0%	0%	#DIV/0!	#DIV/0!	0.00	0.00	
				24	0	0	0	SILICA	75	#DIV/0!	0	0.0350	0.0162		46%	0%	0%	0%	#DIV/0!	#DIV/0!	0.00	0.00	
	F 33	MILL #3	SLURRY TANK	24	0	0	0	IRON ORE	75	#DIV/0!	0	0.0350	0.0162		46%	0%	0%	0%	#DIV/0!	#DIV/0!	0.00	0.00	
				24	0	0	0	RAW MEAL	75	#DIV/0!	0	0.0000	0.0000		50%	0%	0%	0%	#DIV/0!	#DIV/0!	0.00	0.00	
COAL HANDLING	F 34	DUMP	HOPPER	24	10	250	1	COAL	250	280	70000	0.0050	0.0013	ca	25%	0%	0%	0%	0.38	1.40	0.18	0.04	
	F 35	HOPPER	BELT	24	10	250	1	COAL	250	280	70000	0.0050	0.0013	ca	25%	0%	0%	0%	0.35	1.40	0.18	0.04	
	F 36	BELT	COAL ELEVATOR	24	10	250	1	COAL	250	280	70000	0.0050	0.0013	pm10	25%	0%	0%	0%	0.35	1.40	0.18	0.04	
	F 37	COAL ELEVATOR	COAL SILO	24	10	250	1	COAL	250	280	70000	0.0050	0.0013	ca	25%	0%	0%	0%	0.35	1.40	0.18	0.04	
	F 38	COAL SILO	BELT	24	352	8440	1	COAL	10	4	35000	0.0050	0.0013	ca	25%	0%	0%	0%	0.00	0.00	0.01	0.00	
	F 39	BELT	#1 COAL MILL	24	352	8440	1	COAL	10	4	35000	0.0050	0.0013	ca	25%	0%	0%	0%	0.00	0.00	0.01	0.00	
	F 40	COAL SILO	BELT	24	274	6569	1	COAL	10	3	35000	0.0050	0.0013	ca	25%	0%	0%	0%	0.00	0.00	0.01	0.00	
	F 41	BELT	#2 COAL MILL	24	274	6569	1	COAL	10	5	35000	0.0050	0.0013	ca	25%	0%	0%	0%	0.00	0.00	0.01	0.00	
KILN SYSTEM	F 42	SLURRY	#1 KILN	24	352	8448	1	RAW MEAL	60	23	198000	0.0000	0.0000		50%	0%	0%	0%	0.00	0.00	0.00	0.00	
NO. 1	F 43	#1 KILN	COOLER	24	352	8448	1	CLINKER	20	13	110000	0.1500	0.0300		20%	0%	0%	0%	0.04	0.20	0.83	0.17	
	F 44	COOLER	DRAG #1	24	352	8448	1	CLINKER	20	13	110000	0.1500	0.0300		20%	0%	0%	0%	0.04	0.20	0.83	0.17	
	F 45	DRAG #1	DRAG #3	24	352	8448	1	CLINKER	20	13	110000	0.1500	0.0300		20%	0%	0%	0%	0.01	0.04	0.01	0.01	
KILN SYSTEM	F 46	SLURRY	#2 KILN	24	335	8049	1	RAW MEAL	90	31	252000	0.0000	0.0000		20%	0%	0%	0%	0.00	0.00	0.00	0.00	
NO. 2	F 47	#2 KILN	#2 COOLER	24	335	8049	1	CLINKER	30	17	140000	0.1500	0.0300		20%	0%	0%	0%	0.01	0.05	0.01	0.01	
	F 48	#2 COOLER	DRAG #2	24	335	8049	1	CLINKER	30	17	140000	0.1500	0.0300		20%	0%	0%	0%	0.01	0.05	0.01	0.01	
	F 49	DRAG #2	DRAG #3	24	335	8049	1	CLINKER	30	17	140000	0.1500	0.0300		20%	0%	0%	0%	0.01	0.05	0.01	0.01	
	F 49A	DRAG #2	AUX DRAG	24	335	8049	1	CLINKER	30	2	0	0.1500	0.0300		20%	0%	0%	0%	0.00	0.00	0.00	0.00	
	F 49B	AUX DRAG	TRACK BIN	24	335	8049	1	CLINKER	30	0	0	0.1500	0.0300		20%	0%	0%	0%	0.00	0.00	0.00	0.00	
	F 49C	TRACK BIN	CRANE	24	335	8049	1	CLINKER	30	0	0	0.1500	0.0300		20%	0%	0%	0%	0.00	0.00	0.00	0.00	
	SUBTOTAL																						
	clinker receiving	19d	call car	track bin	24	335	8049	1	CLINKER	500	250	80000	0.1500	0.0750		50%	0%	0%	0%	16.00	30.00	4.80	2.40
CLINKER HANDLING	F 50	DRAG #3	CLINKER ELEVATOR	24	365	8760	1	CLINKER	50	40	349216	0.1500	0.0750		50%	0%	0%	0%	0.12	0.24	1.05	0.52	
	F 51	CLINKER ELEVATOR	plenum box	24	365	8760	1	CLINKER	50	12	104765	0.1500	0.0750		50%	0%	0%	0%	0.07	0.31	0.16		
	F 52	plenum box	BIN	24	365	8760	1	CLINKER	50	12	104765	0.5000	0.2500		50%	0%	0%	0%	0.12	0.24	1.05	0.52	
	F 53	BIN	CRANE	24	365	8760	1	CLINKER	50	21	104765	0.5000	0.2500		50%	0%	0%	0%	0.44	36.95	18.48		
	F 54	CRANE	CRANEWAY STORM	24	365	8760	1	CLINKER	50	21	104765	0.5000	0.2500		50%	0%	0%	0%	0.44	36.95	18.48		
	F 55	CLINKER ELEVATOR	DRAG #4	24	365	8760	1	CLINKER	50	28	244451	0.1500	0.0750		50%	0%	0%	0%	0.10	0.21	0.92	0.46	
	F 56	DRAG #4	ELEVATOR #2	24	365	8760	1	CLINKER	50	28	244451	0.1500	0.0750		50%	0%	0%	0%	0.10	0.21	0.92	0.46	
	F 57	ELEVATOR #2	DRAG #5	24	365	8760	1	CLINKER	50	6	52382	0.1500	0.0750		50%	0%	0%	0%	0.00	0.02	0.01	0.00	
	F 58	DRAG #5	CLINKER SILO #1	24	365	8760	1	CLINKER	50	2	20429	0.1500	0.0750		50%	0%	0%	0%	0.00	0.01	0.00	0.00	
	F 59	CLINKER SILO #1	CLINKER SILO #2	24	365	8760	1	CLINKER	50	2	20429	0.1500	0.0750		50%	0%	0%	0%	0.00	0.01	0.00	0.00	
	F 60	CLINKER SILO #2	CLINKER SILO #3	24	365	8760	1	CLINKER	50	1	11224	0.1500	0.0750		50%	0%	0%	0%	0.00	0.00	0.00	0.00	
	F 61	CLINKER SILO #3	ELEVATOR #2	24	365	8760	1	CLINKER	50	22	192069	0.1500	0.0750		50%	0%	0%	0%	0.08	0.18	0.72	0.36	
	F 62	ELEVATOR #2	STACKER BELT #1	24	365	8760	1	CLINKER	50	22	192069	0.1500	0.0750		50%	0%	0%	0%	0.08	0.18	0.72	0.36	
	F 63	STACKER BELT #1	STACKER BELT #2	24	365	8760	1	CLINKER	50	22	192069	0.1500	0.0750		50%	0%	0%	0%	0.08	0.18	0.72	0.36	
	F 64	STACKER BELT #2	STACKER	24	365	8760	1	CLINKER	50	22	192069	0.5000	0.2500		50%	0%	0%	0%	0.14	0.27	1.20	0.60	
	F 65A	STACKER	CRANE	24	365	8500	1	CLINKER	300	21	184765	0.5000	0.2500		50%	0%	0%	0%	2.64	5.21	23.10	11.65	
CLINKER RECLAIM	F 65	CRANE	BIN #1	24	365	8760	1	CLINKER	300	7	61632	0.5000	0.2500		50%	0%	0%	0%	0.68	1.79	7.70	3.85	
	F 66	BIN #1	BIN #2	24	365	8760	1	CLINKER	300	7	61634	0.5000	0.2500		50%	0%	0%	0%	0.68	1.76	7.70	3.85	
	F 67	BIN #2	BIN #3	24	365	8760	1	CLINKER	300	7	61498	0.5000	0.2500		50%	0%	0%	0%	0.68	1.79	7.69	3.84	
	F 68	GALLERY PILE	RECLAIM BELT #1	24	365	8760	1	CLINKER	100	5	48017	0.1500	0.0750		50%	0%	0%	0%	0.00	0.02	0.01	0.01	
	F 69	GALLERY PILE	RECLAIM BELT #1	24	365</																		

TABLE 3

PROCESS FLUITIVE EMISSIONS FOR ASH GROVE CEMENT																						
PROCESS	FLG	NAME FROM	NAME TO	HRS	DAY	YR	HR/SYR	MATERIAL	MAXIMUM THR-PUT TON/HR	AVERAGE THR-PUT TON/HR	ANNUAL THROUGHPUT TON/YR	EMISSION TSP LB/TON	FACTORS	REF	PM10 FRAC %	MOIST CONTI %	CAPT CONTI FACT	BUILD CONTI FACT	EMISSIONS	TSP EMISS TYR	PM-10 EMISS TYR	
F 71	GALLERY PILE	RECLAIM BELT #2	RECLAIM BELT #2	24	365		8760	CLINKER	100	6	48017	0 1500	0 0750		50%	0%	95%	90%	0 00	0 00	0 02	0 01
F 72	RECLAIM BELT #1	RECLAIM BELT #2	RECLAIM BELT #2	24	365		8760	CLINKER	100	11	96034	0 1500	0 0750		50%	0%	95%	90%	0 00	0 01	0 04	0 02
F 73	RECLAIM BELT #2	RECLAIM BELT #3	RECLAIM BELT #3	24	365		8760	CLINKER	100	11	96034	0 1500	0 0750		50%	0%	95%	90%	0 00	0 01	0 04	0 02
F 74	CLINKER SILO #1	RECLAIM BELT #3	RECLAIM BELT #3	24	365		8760	CLINKER	100	2	17461	0 1500	0 0750		50%	0%	95%	90%	0 00	0 00	0 01	0 00
F 75	CLINKER SILO #2	RECLAIM BELT #3	RECLAIM BELT #3	24	365		8760	CLINKER	100	2	17461	0 1500	0 0750		50%	0%	95%	90%	0 00	0 00	0 01	0 00
F 76	CLINKER SILO #3	RECLAIM BELT #3	RECLAIM BELT #3	24	365		8760	CLINKER	100	2	17461	0 1500	0 0750		50%	0%	95%	90%	0 00	0 00	0 01	0 00
F 77	RECLAIM BELT #3	ELEVATOR #3	ELEVATOR #3	24	365		8760	CLINKER	100	28	244451	0 1500	0 0750		50%	0%	95%	90%	0 10	0 21	0 92	0 46
F 78	ELEVATOR #3	CLINKER BIN DRAG	CLINKER BIN DRAG	24	365		8760	CLINKER	100	28	244451	0 1500	0 0750		50%	0%	95%	90%	0 10	0 21	0 92	0 46
F 79	CLINKER BIN DRAG	BIN #1	CLINKER BIN DRAG	24	365		8760	CLINKER	100	9	81542	0 5000	0 2500		50%	0%	95%	90%	0 12	0 23	1 02	0 51
F 80	CLINKER BIN DRAG	BIN #2	CLINKER BIN DRAG	24	365		8760	CLINKER	100	9	81545	0 5000	0 2500		50%	0%	95%	90%	0 12	0 23	1 02	0 51
F 81	CLINKER BIN DRAG	BIN #3	CLINKER BIN DRAG	24	365		8760	CLINKER	100	9	81365	0 5000	0 2500		50%	0%	95%	90%	0 12	0 23	1 02	0 51
KILN NO. 1	F 82	MULTICLONE	SCREW	24	5		125	CKD	4	2	250	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST HANDLING	F 83	SCREW	ELEVATOR	24	5		125	CKD	4	2	250	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST UPSET	F 84	ELEVATOR	SCREW	24	5		125	CKD	4	2	250	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 85	SCREW	BIN	SCREW	24	5		125	CKD	4	2	250	0 2700	0 1350		50%	0%	99%	95%	0 04	0 08	0 01	0 00
F 109	BIN	LOADER	SCREW	24	5		125	CKD	4	2	250	0 2100	0 1350		50%	0%	99%	95%	0 27	0 54	0 03	0 02
KILN NO. 1 ESP	F 92	ESP	SCREW	24	188		4500	CKD	4	1	2250	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST HANDLING	F 97	SCREW	BUNKER	24	188		4500	CKD	4	1	2250	0 2700	0 1350		50%	0%	99%	95%	0 07	0 14	0 30	0 15
DUST UPSET	F 98	BUNKER	LOADER	24	188		4500	CKD	4	1	2250	0 2100	0 1350		50%	0%	99%	95%	0 07	0 14	0 30	0 15
MULTICLONE DUST RETURN	F 92	MULTICLONE	SCREW	24	347		8323	CKD	4	3	21120	0 2700	0 1350		50%	0%	99%	95%	0 00	0 01	0 03	0 01
F 93	SCREW	ELEVATOR	SCREW	24	347		8323	CKD	4	3	21120	0 2100	0 1350		50%	0%	99%	95%	0 00	0 01	0 03	0 01
F 94	ELEVATOR	SCREW	SCREW	24	347		8323	CKD	4	3	21120	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 108	SCREW	PADDLE MIXER	SCREW	24	347		8323	CKD	4	3	21120	0 2100	0 1350		50%	0%	99%	95%	0 01	0 01	0 06	0 03
ESP DUST RETURNED	F 92	PRECIPITATOR	SCREW	24	165		3948	CKD	4	1	5221	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 93	SCREW	ELEVATOR	SCREW	24	185		3948	CKD	4	1	5227	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 94	ELEVATOR	SCREW	SCREW	24	185		3948	CKD	4	1	5227	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 95	SCREW	LEACH TANK	SCREW	24	185		3948	CKD	4	1	5227	0 2100	0 1350		50%	0%	99%	95%	0 05	0 11	0 06	0 03
KILN NO. 2	F 96	MULTICLONE	SCREW	24	5		125	CKD	5	2	250	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST HANDLING	F 97	SCREW	BIN	24	5		125	CKD	5	2	250	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST UPSET	F 98	BIN	LOADER	24	5		125	CKD	5	2	250	0 2100	0 1350		50%	0%	99%	95%	0 27	0 54	0 03	0 02
KILN NO. 2 ESP	F 101	ESP	SCREW	24	188		4500	CKD	4	1	2250	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
DUST HANDLING	F 106	SCREW	BUNKER	24	188		4500	CKD	4	1	2250	0 2100	0 1350		50%	0%	99%	95%	0 07	0 14	0 30	0 15
DUST UPSET	F 107	BUNKER	LOADER	24	188		4500	CKD	4	1	2250	0 2100	0 1350		50%	0%	99%	95%	0 07	0 14	0 30	0 15
MULTICLONE DUST RETURN	F 98	MULTICLONE	SCREW	24	330		7924	CKD	9	2	17920	0 2700	0 1350		50%	0%	99%	95%	0 00	0 01	0 02	0 01
F 99	SCREW	ELEVATOR	SCREW	24	330		7924	CKD	9	2	17920	0 2700	0 1350		50%	0%	99%	95%	0 00	0 01	0 02	0 01
F 100	ELEVATOR	PADDLE MIXER	SCREW	24	330		7924	CKD	9	2	17920	0 2700	0 1350		50%	0%	99%	95%	0 00	0 01	0 02	0 01
ESP DUST	F 101	PRECIPITATOR	SCREW	24	148		3549	CKD	30	1	4435	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 102	SCREW	SCREW	SCREW	24	148		3549	CKD	30	1	4435	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 103	SCREW	ELEVATOR	SCREW	24	148		3549	CKD	30	1	4435	0 2700	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 104	ELEVATOR	SCREW	SCREW	24	148		3549	CKD	30	1	4435	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
F 105	SCREW	LEACH TANK	SCREW	24	148		3549	CKD	30	1	4435	0 2100	0 1350		50%	0%	99%	95%	0 00	0 00	0 00	0 00
FINISH GRINDING MILL # 1	F 110	CLINKER BIN #1	CLINKER FEEDER	24	275		6600	CLINKER	40	18	16225	0 1500	0 0300		20%	0%	95%	90%	0 00	0 01	0 04	0 01
F 111	CLINKER FEEDER	BELT	CLINKER	24	275		6600	CLINKER	40	18	16225	0 1500	0 0300		20%	0%	95%	90%	0 00	0 01	0 04	0 01
F 112	GYPSUM BIN	CRANE	GYPSUM	24	275		300	GYPSUM	8765		0 0350	0 0014			4%	0%	99%	95%	0 00	0 00	0 01	0 00
F 112A	CRANE	GYPSUM FEEDER	GYPSUM	24	275		300	GYPSUM	8765		0 0350	0 0014			4%	0%	99%	95%	0 00	0 00	0 01	0 00
F 112B	GYPSUM FEEDER	BELT	GYPSUM	24	275		6600	GYPSUM	10		6785	0 0350	0 0014		4%	0%	99%	95%	0 00	0 00	0 00	0 00
F 114	BELT	MILL #1	CLINKER	24	275		6600	CLINKER	40	18	16225	0 1500	0 0300		20%	0%	95%	90%	0 00	0 01	0 04	0 01
F 115	CLINKER BIN #2	CLINKER FEEDER	CLINKER	24	275		6600	CLINKER	40	18	16225	0 1500	0 0300		20%	0%	95%	90%	0 00	0 01	0 04	0 01
F 116	CLINKER FEEDER	BELT	CLINKER	24	275		6600	CLINKER	40	18	16225	0 1500	0 0300		20%	0%	95%	90%	0 00	0 01	0 04	0 01
F 117	GYPSUM BIN	CRANE	GYPSUM	24	275		300	GYPSUM	8765		0 0350	0 0014			4%	0%	99%	95%	0 00	0 00	0 01	0 00
MILL #2	F 118	CLINKER BIN #2	CLINKER FEEDER	24	275		6600	CLINKER	80	37	248000	0 2100	0 1350		50%	0%	95%	90%	0 01	0 01	0 03	0 02

6/21/05

PROCESS FLIGHTIVE EMISSIONS FOR ASH GROVE CEMENT

PROCESS	FUG	NAME FROM	NAME TO	HRS	DAYS	MATERIAL	MAXIMUM	AVERAGE	ANNUAL	EMISSION	FACTORS	REF.	PM10	EGRST	CAPT.	BUILD	EMISSIONS		TSP	PM-10	
																	PM10	TSP	EMISS.	TYR	
	F 117A	CRANE	GYPSUM FEEDER	24	275	6600	GYPSUM	300	1	6765	0.0350	0.0014		1%	0%	0%	90%	0.00	0.00	0.01	0.00
	F 118	GYPSUM FEEDER	BELT	24	275	6600	GYPSUM	10	1	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.00	0.00	0.00
	F 119	BELT	MILL #2	24	275	6600	CLINKER	40	18	116235	0.1500	0.0300		20%	0%	95%	90%	0.00	0.01	0.04	0.01
				24	275	6600	GYPSUM	40	18	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.00	0.03	0.00
				24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.01	0.03	0.02
	F 120	MILL #1	CEMENT ELEVATOR	24	275	6600	CEMENT	120	56	369000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.02	0.05	0.02
	F 121	MILL #2	CEMENT ELEVATOR	24	275	6600	CEMENT	120	58	369000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.02	0.05	0.02
	F 122	CEMENT ELEVATOR	AIRSLIDE	24	275	6600	CEMENT	240	112	738000	0.2100	0.1350		50%	0%	95%	90%	0.02	0.03	0.10	0.05
	F 123	AIRSLIDE	SEPARATOR	24	275	6600	CEMENT	240	112	1394000	0.2100	0.1350		50%	0%	95%	90%	0.02	0.03	0.10	0.05
	F 124	SEPARATOR	RETURN SCREW	24	275	6600	CEMENT	240	75	492000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.02	0.07	0.03
	F 125	RETURN SCREW	MILL #1	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.01	0.03	0.02
	F 126	RETURN SCREW	MILL #2	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.01	0.03	0.02
	F 127	SEPARATOR	AIRSLIDE	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.00	0.00		
	F 128	AIRSLIDE	COOLER	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.05	0.10	0.33	0.17
	F 129	COOLER	FK PUMP	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.05	0.10	0.33	0.17
MILL #3	F 130	CLINKER BIN #3	CLINKER FEEDER	24	275	6600	CLINKER	40	18	116235	0.1500	0.0300		20%	0%	95%	90%	0.00	0.01	0.04	0.01
	F 131	CLINKER FEEDER	BELT	24	275	6600	CLINKER	40	18	116235	0.1500	0.0300		20%	0%	95%	90%	0.01	0.04	0.01	0.01
	F 132	ROCK BIN	ROCK FEEDER	24	275	6600	ROCK	75	0	0	0.0350	0.0014		4%	0%	95%	90%	0.00	0.00		
	F 133	ROCK FEEDER	BELT	24	275	6600	ROCK	75	0	0	0.0350	0.0014		4%	0%	95%	90%	0.00	0.00		
	F 134	GYPSUM BIN	CRANE	24	275	6600	GYPSUM	300	1	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.01	0.00	0.00
	F 135A	CRANE	GYPSUM FEEDER	24	275	6600	GYPSUM	300	1	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.01	0.00	0.00
	F 135	GYPSUM FEEDER	BELT	24	275	6600	GYPSUM	10	1	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.00		
	F 136	MILL #3	CLINKER	24	275	6600	ROCK	75	0	0	0.0350	0.0014		4%	0%	95%	90%	0.00	0.01	0.00	0.00
	F 137	MILL #3	GYPSUM	24	275	6600	GYPSUM	10	1	6765	0.0350	0.0014		4%	0%	95%	90%	0.00	0.01	0.00	0.00
	F 138	MILL #3	CEMENT ELEVATOR	24	275	6600	CEMENT	120	56	369000	0.2700	0.1350		50%	0%	95%	90%	0.04	0.08	0.25	0.12
	F 139	CEMENT ELEVATOR	AIRSLIDE	24	275	6600	CEMENT	120	0	0	0.2700	0.1350		50%	0%	95%	90%	0.00	0.00		
	F 140	AIRSLIDE	SEPARATOR #2	24	275	6600	CEMENT	120	0	0	0.2700	0.1350		50%	0%	95%	90%	0.04	0.08	0.25	0.12
	F 141	SEPARATOR #2	RETURN SCREW	24	275	6600	Masonry	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.03	0.05	0.17	0.08
	F 142	RETURN SCREW	MILL #3	24	275	6600	CEMENT	80	37	246000	0.2700	0.1350		50%	0%	95%	90%	0.03	0.05	0.17	0.08
	F 143	SEPARATOR #2	AIRSLIDE	24	275	6600	CEMENT	40	19	123000	0.2700	0.1350		50%	0%	95%	90%	0.01	0.03	0.08	0.04
	F 144	AIRSLIDE	COOLER	24	275	6600	Masonry	40	19	123000	0.2700	0.1350		50%	0%	95%	90%	0.00	0.00		
	F 145	COOLER	FK PUMP	24	275	6600	Masonry	40	0	0	0.2700	0.1350		50%	0%	95%	90%	0.00	0.00		
FINISH SILOS FROM MILL #1 & 2	F 146	FK PUMP (MILL #1 & 2)	SILO #1	24	15	375	CEMENT	80	0	0	0.2700	0.1350		50%	0%	95%	90%	0.00	0.00		
	F 147	FK PUMP (MILL #1 & 2)	SILO #2	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 148	FK PUMP (MILL #1 & 2)	SILO #3	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 149	FK PUMP (MILL #1 & 2)	SILO #4	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 150	FK PUMP (MILL #1 & 2)	SILO #5	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 151	FK PUMP (MILL #1 & 2)	SILO #6	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 152	FK PUMP (MILL #1 & 2)	SILO #7	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 153	FK PUMP (MILL #1 & 2)	SILO #8	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 154	FK PUMP (MILL #1 & 2)	SILO #9	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 155	FK PUMP (MILL #1 & 2)	SILO #10	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 156	FK PUMP (MILL #1 & 2)	SILO #11	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 157	FK PUMP (MILL #1 & 2)	SILO #12	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 158	FK PUMP (MILL #1 & 2)	SILO #13	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
	F 159	FK PUMP (MILL #1 & 2)	SILO #14	24	15	375	CEMENT	80	39	14737	0.2700	0.1350		50%	0%	95%	90%	0.11	0.02	0.01	
FINISH SILOS FROM MILL #3	F 160	FK PUMP (MILL #3)	SILO #1	24	15	348	Masonry	40	5	676	0.2700	0.1350		50%	0%	95%	90%	0.00	0.01	0.00	
	F 161	FK PUMP (MILL #3)	SILO #2	24	15	348	CEMENT	40	18	676	0.2700	0.1350		50%	0%	95%	90%	0.02	0.05	0.01	
	F 162	FK PUMP (MILL #3)	SILO #3	24	15	348	CEMENT	40	18	676	0.2700	0.1350		50%	0%	95%	90%	0.02	0.05	0.01	
	F 163	FK PUMP (MILL #3)	SILO #4	24	15	348	CEMENT	40	18	676	0.2700	0.1350		50%	0%	95%	90%	0.02	0.05	0.01	
	F 164	FK PUMP (MILL #3)	SILO #5	24	15	348	CEMENT	40	18	676	0.2700	0.1350		50%	0%	95%	90%	0.02	0.05	0.01	

PROCESS FLUENT EMISSIONS FOR ASH GROVE CEMENT

PROCESS	FLG	NAME FROM CODE	NAME TO	HRS	DAYS	TYP	HRSYR	MATERIAL	MAXIMUM THR-PUT YOAH	AVERAGE THR-PUT YOAH	ANNUAL THROUGHPUT TON/YR	EMISSION TSP LB/TON	FACTORS PM10 1BTION	REF	PM10 FRAC %	NOX CONC.	CAPT. CONC.	BLND. CONC.	EMISSIONS PM10 LB/HR	TSP TYP	PM-10 EMISS. TYP	TSP EMISS. TYP	
									TON/HR	TON/HR	TON/YR	% FACY	CONT. FACT	CONT. FACT	CONT. FACT	PM10	TSP	LB/HR	TYP	TYP	TYP	TYP	
	F	163	FK PUMP (MILL #3)	SILO #5	24	15		348	CEMENT	40	18	6376	0.2700	0.1350		50%	0%	95%	0%	0.02	0.05	0.01	0.00
	F	164	FK PUMP (MILL #3)	SILO #6	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	165	FK PUMP (MILL #3)	SILO #7	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	166	FK PUMP (MILL #3)	SILO #8	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	167	FK PUMP (MILL #3)	SILO #9	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	168	FK PUMP (MILL #3)	SILO #10	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	169	FK PUMP (MILL #3)	SILO #11	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
	F	170	FK PUMP (MILL #3)	SILO #12	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.02	0.05	0.01	0.00
	F	171	FK PUMP (MILL #3)	SILO #13	24	15		348	CEMENT	40	18	6376	0.2700	0.1350		50%	0%	95%	0%	0.02	0.05	0.01	0.00
	F	172	FK PUMP (MILL #3)	SILO #14	24	15		348	CEMENT	40	18	6388	0.2700	0.1350		50%	0%	95%	0%	0.01	0.05	0.01	0.00
CEMENT bottom system	F	173	SILO #1	SCREW #1	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	174	SILO #2	SCREW #1	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	175	SILO #3	SCREW #1	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	176	SILO #4	SCREW #1	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	177	SILO #5	SCREW #1	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	178	SCREW #1	ELEVATOR # 1	24	37		881	CEMENT	150	75	66071	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.04	0.02
	F	179	SCREW #1	ELEVATOR # 1	24	37		881	CEMENT	150	75	66071	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.04	0.02
	F	180	SILO #6	SCREW #2	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	181	SILO #7	SCREW #2	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	182	SILO #8	SCREW #2	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	183	SCREW #2	SCREW #4	24	22		529	CEMENT	150	75	39643	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.03	0.01
	F	184	SILO #12	SCREW #3	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	185	SILO #13	SCREW #3	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	186	SILO #14	SCREW #3	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	187	SCREW #3	SCREW #4	24	22		529	CEMENT	150	75	39643	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.03	0.01
	F	188	SCREW #4	ELEVATOR #1	24	44		1057	CEMENT	150	75	79286	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.03	0.02
	F	189	SILO #9	SCREW #6	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	190	SILO #10	SCREW #6	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	191	SILO #11	SCREW #6	24	7		176	CEMENT	150	75	13214	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.01	0.00
	F	192	SCREW #6	SCREW #5	24	22		529	CEMENT	150	75	39643	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.03	0.01
	F	193	SCREW #5	ELEVATOR #1	24	22		529	CEMENT	150	75	39643	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.03	0.01
	F	194	ELEVATOR #1	DISCHARGE SCREW	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.05	0.10	0.12	0.06
	F	195	DISCHARGE SCREW	RAIL LOADOUT	24	0		0	CEMENT	150	0	#DIV/0!	0.2700	0.1350		50%	0%	95%	0%	#DIV/0!	#DIV/0!	0.00	0.00
BY TRUCK	F	196	DISCHARGE SCREW	TRANSFER SCREW	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	197	TRANSFER SCREW	SCREW	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	198	SCREW	TANK A	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	199	SCREW	TANK B	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	200	SCREW	TANK C	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	201	TANK A	TRUCK LOADOUT	24	34		822	CEMENT	500	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.51	1.01	0.42	0.21
	F	202	TANK B	TRUCK LOADOUT	24	34		822	CEMENT	500	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.51	1.01	0.42	0.21
	F	203	TANK C	TRUCK LOADOUT	24	34		822	CEMENT	500	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.51	1.01	0.42	0.21
CEMENT back system	F	204	AIRSLIDE 9-14	AIRSLIDE	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	205	AIRSLIDE	ELEVATOR #4	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	206	SCREW #8	AIRSLIDE	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	207	AIRSLIDE	ELEVATOR #4	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.01	0.01	0.01	0.01
	F	208	ELEVATOR #4	ELEVATOR #5	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	209	ELEVATOR #5	AIRSLIDE	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	210	AIRSLIDE	SCREW	24	103		2467	CEMENT	150	75	185000	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
CEMENT BY PACKAGE	F	211	SCREW	TANK A	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	212	SCREW	TANK B	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	213	SCREW	TANK C	24	34		822	CEMENT	150	75	61667	0.2700	0.1350		50%	0%	95%	0%	0.08	0.15	0.06	0.03
	F	209a	Airslide	raill loadout	24	0		0	CEMENT	150	0	#DIV/0!	0.2700	0.1350		50%	0%	95%	0%	#DIV/0!	#DIV/0!	0.00	0.

TABLE 3

PROCESS FUGITIVE EMISSIONS FOR ASHI GROVE CEMENT

PROCESS	FUG	NAME FROM	NAME TO	HRS	DAYS	MATERIAL	MAXIMUM	AVERAGE	ANNUAL	EMISSION	FACTORS	REF	PM10	MOIST	CAPT	BURN	EMISSIONS	TSP	PM-10
	CODE			/DAY	/YR	HRS/YR	THR PUT	THR PUT	THROUGHPUT	TSP	PM10		FRAC	CONTL	CONTL	CONTL	PM10	TSP	EMISS
							TON/HR	TON/HR	LB/TON	LB/TON	LB/TON	%	FACT	FACT	FACT	LB/HR	T/HR	TYR	
	F222	BIN #2	PACKER # 2	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F223	BIN #1/PACKER #1	SPILL AIRSLIDE	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F224	BIN #2/PACKER #2	SPILL AIRSLIDE	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F225	SPILL AIRSLIDE	ELEVATOR #2	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F226	ELEVATOR #2	NORTH SOUTH SCR	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F227	NORTH SOUTH SCR	BIN #1	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F228	NORTH SOUTH SCR	BIN #2	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F229	SILO #8	AIRSLIDE	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	E230	AIRSLIDE	BIN #2	24	0	0	CEMENT	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
MASONRY BY PACKAGE	F231	SILO #1	SCREW #1	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F232	SCREW #1	ELEVATOR #2	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F233	ELEVATOR # 2	NORTH SOUTH SCR	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F234	NORTH SOUTH SCR	BIN #3	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F235	BIN #3	PACKER #2	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F236	BIN #3/PACKER #3	SPILL SCREW	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F237	SPILL SCREW	ELEVATOR #3	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
	F238	ELEVATOR #3	BIN #3	24	0	0	Masonry	150	#DIV/0!	0	0.1350		50%	0%	95%	#DIV/0!	#DIV/0!	0.00	0.00
TOTAL																	204	88.69	

6/21/95

TABLE 4

1994 PAVED ROAD EMISSIONS SUMMARY FOR ASH GROVE CEMENT

Segment No.	Segment Length (mi)	Paved Road Data			Material Trips (#/yr)	Total Mileage (Mi/yr)	Rain Days (year)	Water Control %	TSP Empty Trucks lb/VMT	TSP Loaded Trucks lb/VMT	PM-10 Emissions Paved lb/VMT	Total Emissions TSP (T/yr)	Total Emissions PM10 (T/yr)
		Surface dust (lb/mi)	SIII %	SIII Loading (oz/yd ²)									
3A	0.03	1750.00	12.50	0.35	54560	1555	90	0.00	2.98	4.23	0.77	2.83	0.60
3B	0.05	1750.00	12.50	0.35	61974	2949	90	0.00	3.01	4.27	0.77	5.41	1.14
3C	0.03	1750.00	12.50	0.35	33876	965	90	0.00	2.98	4.74	0.77	1.69	0.37
3D	0.02	1750.00	12.50	0.35	33600	640	90	0.00	2.99	4.74	0.77	1.06	0.25
3E	0.02	1750.00	12.50	0.35	33324	793	90	0.00	3.01	4.74	0.77	1.32	0.31
3F	0.01	1750.00	12.50	0.35	33324	476	90	0.00	3.01	4.74	0.77	0.79	0.18
3FF	0.03	1750.00	12.50	0.35	28650	954	90	0.00	3.01	4.14	0.77	1.71	0.37
3I	0.01	1750.00	12.50	0.35	276	4	90	0.00	n/a	2.27	0.77	0.00	0.00
3J	0.06	1750.00	12.50	0.35	276	16	90	0.00	n/a	2.27	0.77	0.02	0.01
3K	0.03	1750.00	12.50	0.35	276	8	90	0.00	n/a	2.27	0.77	0.01	0.00
3L	0.08	1750.00	12.50	0.35	276	22	90	0.00	n/a	2.27	0.77	0.03	0.01
3N	0.02	1750.00	12.50	0.35	3889	74	90	0.00	n/a	5.03	0.77	0.19	0.03
3R	0.03	1750.00	12.50	0.35	3707	123	90	0.00	3.24	4.51	0.77	0.24	0.05
3M	0.05	1750.00	12.50	0.35	9127	434	90	0.00	3.64	4.90	0.77	0.93	0.17
		TOTAL	297136	9013								16.12	3.47

TABLE 5

1994 UNPAVED ROADS EMISSION SUMMARY FOR ASH GROVE CEMENT

Segment No.	Segment Length (mi)	SIII %	Average* Vehicle Speed (mph)	Material Trips (#/yr)	Total Mileage (Mi/yr)	Rain Days (year)	Water Control %	TSP Empty Trucks lb/VMT	TSP Loaded Trucks lb/VMT	PM-10 Emissions Unpaved lb/VMT	PM-10 Emissions Unpaved lb/VMT	Total Emissions TSP (T/yr)	Total Emissions PM10 (T/yr)
1	0.25	7.10	13	8000	2000	90	70	1.77	2.29	0.64	0.82	2.03	0.73
2	0.10	7.10	13	8000	800	90	70	1.77	2.29	0.64	0.82	0.81	0.29
D	0.10	7.10	13	5111	511	90	70	4.01	5.05	1.45	1.82	1.16	0.42
3P	0.20	7.10	13	4889	978	90	70	1.21	5.98	0.44	2.15	2.69	0.97
3P1	0.10	7.10	13	3889	389	90	70	n/a	6.51	n/a	2.34	1.27	0.46
3Q	0.10	7.10	13	3889	389	90	70	5.29	n/a	1.90	n/a	1.03	0.37
3O	0.07	7.10	13	3889	259	90	70	n/a	6.51	n/a	2.34	0.84	0.30
HR1	0.20	7.10	13	38000	7600	90	70	0.44	0.51	0.16	0.18	1.80	0.65
LR1	0.20	7.10	13	38000	7600	90	70	0.44	0.51	0.16	0.18	1.80	0.65
CKD	0.10	7.10	13	1000	100	90	70	1.21	1.89	0.44	0.68	0.08	0.03
G1	0.10	7.10	13	1652	165	90	70	5.29	6.51	1.90	2.34	0.49	0.18
G2	0.10	7.10	13	1342	134	90	70	5.29	6.51	1.90	2.34	0.40	0.14
I1	0.07	7.10	13	310	22	90	70	5.29	6.51	1.90	2.34	0.06	0.02
S1	0.06	7.10	13	2307	131	90	70	1.77	2.29	0.64	0.82	0.13	0.05
3g	0.03	7.10	13	3897	221	90	70	3.46	6.51	1.24	2.34	0.72	0.26
3h	0.06	7.10	13	5050	287	90	70	0.44	5.54	n/a	2.00	0.80	0.29
3S	0.13	7.10	13	1276	73	90	70	0.44	1.89	0.48	0.68	0.06	0.02
3T	0.10	7.10	13	5000	284	90	70	0.44	0.51	0.16	0.18	0.07	0.02
3U	0.17	7.10	13	6652	378	90	70	0.44	2.00	n/a	0.72	0.34	0.12
TOTAL				129225	21586							TOTAL	16.58
													5.97

6/21/95

TABLE 7

PROPOSED PARTICULATE EMISSIONS FROM STORAGE PILES FOR ASH GROVE CEMENT

Area	Pile Num.	Pile Material	Pile Storage (Tons)	Pile Area (Acres)	Material Moisture (%)	Material Throughput (T/yr)	AVG Wind Speed (mph)	Rain Days (days/yr)	TSP Transfer Factor (lb/Ton)	TSP Wind Factor (lb per acre/day)	TSP Transfer Emissions (T/yr)	PM ₁₀ Transfer Factor (lb/Ton)	PM ₁₀ Wind Factor (lb per acre/day)	PM ₁₀ Transfer Emissions (T/yr)	PM ₁₀ Wind Emissions (T/yr)	TSP Total Emissions (T/yr)	PM ₁₀ Total Emissions (T/yr)	
Quarry	1	Limestone (High)	50000	2.00	8	190000	10.2	90	0.00116	3.5	0.1103	0.98	0.00041	1.7	0.04	0.4675	1.07	0.61
Quarry	2	Limestone (Low)	50000	2.00	8	190000	10.2	90	0.00116	3.5	0.1103	0.96	0.00041	1.7	0.04	0.4675	1.07	0.61
Quarry	3	Gypsum	3370	0.50	8	21000	10.2	90	0.00116	3.5	0.0122	0.24	0.00041	1.7	0.00	0.1169	0.25	0.12
Quarry	4	Iron Ore	988	0.40	2	4000	10.2	90	0.00808	3.5	0.0162	0.19	0.00283	1.7	0.01	0.0935	0.21	0.10
Plant	5	Coal	8965	1.00	5	70000	10.2	90	0.00224	3.5	0.0765	0.48	0.00078	1.7	0.03	0.2338	0.58	0.26
Quarry	8	Silica	26098	1.00	10	40000	10.2	80	0.00085	3.5	0.0170	0.48	0.00030	1.7	0.01	0.2338	0.60	0.24
Quarry	7	CKD	10000	1.00	1	5000	10.2	90	0.02134	3.5	0.0533	0.48	0.00747	1.7	0.02	0.2338	0.63	0.25
															TOTAL	4.20	1.99	

REFERENCES:

- AP-42 SECTION 11.2.3 (PILE TRANSFERS)
- AP-42 SECTION 8.19.1 (PILE WIND EROSION)
- ASSUMED NO WIND EROSION ON RAIN DAYS

APPENDIX B

AGREEMENT BETWEEN ASH GROVE CEMENT, EPA, DEQ

In summary of the issues discussed on June 15, 1995, between Ash Grove Cement ("Ash Grove"), the U. S. Environmental Protection Agency ("EPA"), and the Idaho Division of Environmental Quality ("IDEQ"), this document identifies the actions that must be completed to revise the Power-Bannock Counties PM-10 Nonattainment Area ("PBNAA") boundary to exclude Inkom.

Underlying Objectives

1. Protect the National Ambient Air Quality Standards.
2. Provide Ash Grove maximum flexibility under the law.
3. Reserve all rights and remedies under the law available to Ash Grove.

Action Items

1. (a) IDEQ will issue a Tier II operating permit by June 30, 1995. PM-10 emissions limits will be based upon representative historic levels of PM-10 emissions, as discussed on June 15, 1995, provided that an adequate technical demonstration is made. This level is estimated to be approximately 230 tons per year. The permit may be modified after June 30, 1995 to establish reasonable conditions reflective of the discussions on June 15, 1995.

(b) IDEQ shall supply a PM-10 monitoring device and conduct hot spot PM-10 monitoring with sampling every other day, for at least one year, beginning on or about October 1, 1995. At the conclusion of the first year of the hot spot monitoring, Ash Grove and IDEQ can review the need for continued hot spot PM-10 monitoring.

(c) Permit emissions cap can be adjusted in the future based on PM-10 hot spot monitoring data or improved emission estimates.

(d) IDEQ will incorporate the Tier II permit conditions into the Tier I permitting process.

(The Tier I permit may propose additional conditions to meet the requirements of 40 CFR Part 70.)

- (e) If necessary, Ash Grove can use the Tier II permit limits for PM-10 in the preconstruction review process to "net out" of the requirements under the rules for Prevention of Significant Deterioration.
2. IDEQ will inform Governor Phil Batt of Idaho, and EPA will inform the Idaho Congressional delegation of this action plan.
 3. If the Tier II permit described in Action Item 1 is issued, EPA will extend for one year the PM-10 attainment date for the PBNAA. Anticipated publication of the Federal Register notice is scheduled for July, 1995.
 4. If the Tier II permit described in Action Item 1 is issued, EPA will proceed with the process of revising the PM-10 PBNAA boundary to identify the Inkom area as an "unclassifiable" area, on or before January 1, 1996, according to the procedure set forth in Section 110 of the Clean Air Act, 42 USC § 7410(k)(6).
 5. After collecting three years of adequate data from the Inkom PM-10 monitoring station, to demonstrate attainment in Inkom, Ash Grove, IDEQ, and EPA will review the opportunity to pursue the redesignation of Inkom to PM-10 attainment.

Signed:

Phil Millam, Acting Director, Air and
Radiation Programs, U.S. EPA Region X

Date:

Date: 6/26/95

Orville Green

Orville Green, Assistant Administrator
Idaho Division of Environmental Quality

Douglas Hale, Safety and Environmental
Manager, Western Region, Ash Grove Cement

Date: